

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MONDELÉZ GLOBAL LLC,

Plaintiff,

vs.

ASSOCIATED MILK PRODUCERS INC.

Defendant.

Case No. 20-CV-06512

Judge Franklin U. Valderrama

Mag. Judge Heather K. McShain

JOINT STATUS REPORT

Plaintiff Mondelēz Global LLC (“MDLZ”) and Defendant Associated Milk Producers Inc. (“AMPI”), by and through their respective counsel, provide the following Joint Status Report in response to the Court’s February 18, 2021 Order (ECF No. 21):

1. On January 19, 2021, the parties filed their Joint Initial Status Report (ECF No. 15) containing a discovery plan and proposed scheduling order to be entered pursuant to Fed. R. Civ. P. 16(b).

2. In response to the Court’s February 18, 2021 Order, the parties have conferred regarding whether any modifications are needed to the proposed schedule filed on January 19, 2021, and agree that the only modification required is to change the deadline for Rule 26(a)(1) Initial Disclosures to Friday, February 26, 2021. Accordingly, the new schedule proposed by the parties is as follows:

Event	Deadline
Rule 26(a)(1) Initial Disclosures	February 26, 2021
Deadline to serve initial discovery requests	March 4, 2021
Amendment to the pleadings or to add parties	July 16, 2021
Service of process on any “John Does”	N/A

Event	Deadline
Completion of Fact Discovery	November 15, 2021
Disclosure of Plaintiff's Expert Report(s)	December 15, 2021
Disclosure of Defendant's Expert Report(s)	February 15, 2022
Disclosure of Plaintiff's Rebuttal Expert Report(s)	April 15, 2022
Completion of Expert Discovery (including completion of depositions of Plaintiff's and Defendant's Expert(s))	June 14, 2022
Dispositive Motions	July 14, 2022

3. The parties will email a revised Proposed Agreed Scheduling Order consistent with this schedule to the Court at Proposed_Order_McShain@ilnd.uscourts.gov.

Dated: February 24, 2021

Respectfully submitted,

MONDELÉZ GLOBAL LLC

ASSOCIATED MILK PRODUCERS INC.

By: /s/ Dean N. Panos
One of its attorneys

By: /s/ Joseph R. Marconi
One of its attorneys

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Counsel for Plaintiff

Counsel for Defendant

CERTIFICATE OF SERVICE

I, Dean N. Panos, certify that on February 24, 2021, I caused the foregoing Joint Status Report to be electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a Notice of Electronic Filing to all counsel of record.

/s/ Dean N. Panos